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Attorneys for Defendants
9 BLOCK, INC. and CASH APP INVESTING, LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 MICHELLE SALINAS and RAYMEL
14 WASHINGTON, individually and on behalf of
all others similarly situated,

15 Plaintiffs,

16 v.

17 BLOCK, INC. and CASH
18 APP INVESTING, LLC,

19 Defendants.
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Case No. 3:22-cv-04823-AMO

**STIPULATION PURSUANT TO CIVIL
L.R. 6-1(B) TO MODIFY CASE
SCHEDULE**

Judge: Hon. Araceli Martinez-Olguín

Pursuant to Local Rule 6-1(b), Plaintiffs Michelle Salinas and Raymel Washington and Defendants Block, Inc. and Cash App Investing, LLC, by and through the undersigned counsel, hereby stipulate and agree to the following proposed modification of the case schedule:

WHEREAS, the Complaint (ECF No. 1) was filed on August 23, 2022;

WHEREAS, a complaint was filed in an action captioned *Gordon v. Block Inc. and Cash App Investing, LLC*, No. 22-cv-6787 (N.D. Cal.) on November 2, 2022;

WHEREAS, the parties previously stipulated, and the Court approved, that the time for Defendants to answer or otherwise respond to the Complaint be extended to February 3, 2023 (ECF Nos. 22, 25, 33, 34, 39, 40);

WHEREAS, on December 6, 2022, the Court ordered that this matter and *Gordon* be related;

WHEREAS, on December 15, 2022, Defendants filed a motion to consolidate the *Salinas* and *Gordon* actions that is opposed by Plaintiff Gordon;

WHEREAS, the parties previously stipulated to continue the hearing on Defendants' motion to consolidate to the second Thursday after the parties engaged in mediation (ECF No. 50);

WHEREAS, the parties previously stipulated that if the Court grants Defendants' motion to consolidate, then the deadline for Defendants to answer or otherwise respond be continued to 30 days after the filing of a consolidated complaint (ECF No. 50);

WHEREAS, the parties previously stipulated that if the Court denies Defendant's motion to consolidate, then the deadline for Defendants to answer or otherwise respond to the Complaint be continued to 30 days after the Court's denial of the motion (ECF No. 50);

WHEREAS, the Court vacated the hearing on Defendants' motion to consolidate and set a case management conference for May 11, 2023 at 1:30 p.m. by a Zoom videoconference with updated case management conference statements due by May 4, 2023 (ECF No. 51);

WHEREAS, the parties engaged in mediation in an attempt to reach an early resolution of this action on April 24, 2023;

WHEREAS, on May 1, 2023, to facilitate continuing discussions concerning the possibility of early resolution, the Parties stipulated, and the Court approved, that the Case Management

1 Conference previously scheduled for May 11, 2023, be continued to July 13, 2023, and that the
2 action would otherwise be stayed through the completion of the Case Management Conference
3 (ECF Nos. 54 and 55);

4 WHEREAS, pursuant to this Court's Order Reassigning Case (ECF No. 57), this case was
5 reassigned to the Honorable Araceli Martinez-Olguin in the San Francisco Division for all further
6 proceedings; all then-existing deadlines were vacated; and the Parties were required to file a Joint
7 Case Management Statement on or before May 31, 2023;

8 WHEREAS, on May 31, 2023, the Parties jointly filed a Stipulation Pursuant to Civil L.R.
9 6-1(B) (ECF No. 36), stipulating the following: (i) the Joint Case Management Statement would be
10 due on July 6, 2023; (ii) the Case Management Conference previously vacated would be
11 rescheduled by the Court to July 13, 2023, at 10:00 a.m. via Zoom video conference; and (iii) the
12 action would be otherwise stayed through the completion of the Case Management Conference.
13 The Court has not yet entered an Order as to this Stipulation (ECF No. 59);

14 WHEREAS, on June 2, 2023, the Court ordered the Parties to submit a Joint Case
15 Management Statement on July 6, 2023 and otherwise stayed the action (ECF No. 60);

16 WHEREAS, the Parties scheduled another mediation to take place on August 28, 2023. The
17 Parties plan to continue discussions regarding the possibility of early resolution of the case prior to
18 and during the mediation;

19 WHEREAS, in light of the upcoming mediation and the possibility of early resolution, the
20 Parties believe the *Salinas* action should continue to be stayed;

21 NOW, Plaintiff and Defendants hereby stipulate that:

- 22 • The Joint Case Management Statement shall be due on September 15, 2023
- 23 • The action is otherwise stayed.

24 This is the sixth extension sought by the parties to this litigation and is sought because the
25 parties are attempting to resolve this dispute.

26 **IT IS SO STIPULATED.**

27 Dated: June 29, 2023

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By: /s/ Michelle Visser
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Attestation re Electronic Signatures

I, Michelle Visser, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's contents and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 29, 2023

By: /s/ Michelle Visser
MICHELLE VISSER